

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2008**

Date filed: **February 09, 2009**

Name of company covered by this certification/Form 499 Filer ID:

Rock Hill Telephone Company (d/b/a "Comporium Communications") - FCC 499 Filer ID: 803649, Fort Mill Telephone Company (d/b/a "Comporium Communications") - FCC 499 Filer ID: 803655, Lancaster Telephone Company (d/b/a "Comporium Communications") - FCC 499 Filer ID: 803652, Citizens Telephone Company (d/b/a "Comporium Communications") - FCC 499 Filer ID: 804816, Community Long Distance, Inc. (d/b/a "Comporium Communications") - FCC 499 Filer ID: 804993, Springboard Telecom, LLC - FCC 499 Filer ID: 819828, and Comporium Wireless, LLC - FRN: 0005464284 (collectively the "Company").

Name of signatory: **Matthew L. Dosch**

Title of signatory: **Vice President – External Affairs**

I, Matthew L. Dosch, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed _____



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Lancaster Telephone Company – FCC 499 Filer ID: 803652
Citizens Telephone Company – FCC 499 Filer ID: 804816
Community Long Distance Company – FCC 499 Filer ID: 804993
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Comporium Wireless, LLC– FRN: 0005464284

P O. Box 470, Rock Hill, South Carolina 29731

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Rock Hill Telephone Company (d/b/a "Comporium Communications") and its affiliated companies, Fort Mill Telephone Company (d/b/a "Comporium Communications"), Lancaster Telephone Company (d/b/a "Comporium Communications"), Citizens Telephone Company (d/b/a "Comporium Communications"), Long Distance, Inc. (d/b/a "Comporium Communications"), Springboard Telecom, LLC and Comporium Wireless, LLC (collectively the "Company") is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Part 64, Subpart U, Section 64.2003(d) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC's rules at Part 64, Subpart U, Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008. The Company has complied with the notice requirements for Opt-Out approval. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

7. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's Part 64, Subpart U CPNI rules.

8. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.